



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 01 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL

RETURN RECEIPT REQUESTED 7009 1680 0000 7677 8909

Mr. Michael Avans
Manager of Environmental Control
Canadian National Railway Company
17550 South Ashland Avenue
Homewood, Illinois 60430

Re: IL Central Rail Road
EPA ID No.: ILD057862393

Dear Mr. Avans:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires IL Central Rail Road (the facility or you) to submit certain information relating to the management of used oil at its facility located at 17550 South Ashland Avenue in Homewood, Illinois. We are requiring this information to determine the facility's compliance status with the Standards for the Management of Used Oil set forth at Title 35 of the Illinois Administrative Code (IAC), Part 739; and Title 40 of the Code of Federal Regulations (CFR), Part 279. The enclosure specifies the information you must submit. You must submit this information within thirty (30) calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Todd Brown, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

IL Central Rail Road must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should

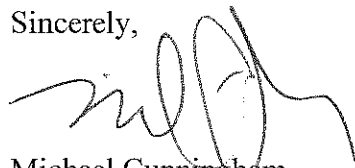
notify us. Knowingly providing false information in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject IL Central Rail Road to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Todd Brown, at (312) 886-6091.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Cunningham', is written over the word 'Sincerely,'.

Michael Cunningham
Chief
Compliance Section 1

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.

During a U.S. EPA inspection on August 27, 2013, the inspector observed that oil and materials contaminated with oil are accumulated in two man-made ponds located adjacent to the wastewater treatment building. Personnel for IL Central Rail Road (ILCRR) explained that the material in the ponds is derived through removal from wastewater generated during locomotive engine washing and servicing operations. With respect to these ponds and their contents, provide the following information (Requests 2 through 19).

2. Describe the sources of the oil in the wastewater at your facility. In your answer, be specific to the equipment from which the oil originates, and the processes that result in the generation of wastewater contaminated with oil.
3. Describe the flow of all wastewater at the facility from its points of generation through its treatment and discharge. In your answer, include the following:
 - (a) A description of all processes that generate wastewater at the facility, and their locations;
 - (b) All equipment/structures the wastewater flows through;
 - (c) All physical and chemical treatment conducted on the wastewater to remove oil and other contaminants, in the order in which they occur; and
 - (d) All points of discharge of wastewater from the facility.
4. Identify all materials, including wastes, generated by ILCRR's wastewater treatment operations, including the physical/chemical composition of each material.
5. Describe how each material generated through ILCRR's wastewater treatment operations is stored on-site by ILCRR prior to its recycling and/or disposal.
6. Identify the disposition of all material generated by ILCRR's wastewater treatment operations. In your answer, be specific as to whether the material is recycled or disposed of, on- or off-site.
7. Describe how oil, and material contaminated with oil, is placed into the two ponds. In your answer, be specific to all equipment and processes that directly add material into the ponds.

8. Identify the surface area, depth, and volume of the two ponds.
9. Describe the structure of the two ponds, including, but not limited to: liners to prevent migration of fluid out of the ponds; leak detection devices; and leachate collection systems.
10. Describe how ILCRR prevents surface run-off out of the two ponds.
11. Identify the frequency at which ILCRR removes material from the two ponds; what the removed material is; and what is done with it.
12. Identify all times in the past when sludges or other accumulated materials have been removed from the two ponds, and to where the removed materials were shipped. Provide true and accurate copies of the shipping records for any past off-site shipments of materials removed from the ponds.
13. State whether ILCRR has made any hazardous waste determinations on material removed from the ponds, and describe the results of those determinations.
14. If the answer to item 13, above, is affirmative, provide true and accurate copies of the records which document the determinations.
15. State how long the two ponds have been in existence at ILCRR's facility.
16. State how long ILCRR has been using the two ponds to accumulate oil and/or materials contaminated with oil.
17. Provide a true and accurate copy of ILCRR's current Spill Prevention Control and Countermeasures Plan.
18. Identify the owner and operator of the facility. Provide copies of the Articles of Incorporation and corporate organization chart.
19. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.